#### NO. 14-14-00589-CV

# IN THE COURT OF APPEALS FOURTEENTH JUDICIAL DISTRICT HOUSTON, TEXAS

14th COURT OF APPEALS HOUSTON, TEXAS 6/4/2015 2:06:46 PM CHRISTOPHER A. PRINE Clerk

1717 BISSONNET, L.L.C.,

**Defendant/Appellant/Cross-Appellee** 

VS.

PENELOPE LOUGHHEAD, ET. AL,

Plaintiffs/Appellees/Cross-Appellants

\_\_\_\_\_

On Appeal from the 157<sup>th</sup> Judicial District Court, Harris County, Texas

Case Number 2013-26155

\_\_\_\_\_

### JOINT MOTION TO EXTEND TIME FOR FILING REPLY BRIEFS

Plaintiffs/Appellees/Cross-Appellants, Penelope Loughhead, et. al, and Defendant/Appellant/Cross-Appellee, 1717 Bissonnet, L.L.C., move jointly to extend the time for filing their respective reply briefs.

Both sides filed their opening briefs as appellants on April 8, 2015. The parties jointly requested, and the Court granted, an extension of time for both sides to file appellees briefs until June 8, 2015. By this motion, both sides jointly

seek an additional 27 days for filing these briefs, or to and including July 1, 2015.

Counsel for both sides seek additional time for preparing and filing their

responsive briefs because counsel for Plaintiffs/Appellees has substantial other

matters requiring immediate attention, including post-verdict motions and hearing

in Cause No. 2013-28613; Enterprise Texas Pipeline LLC v. Energy Transfer

Fuel, L.P.; In the 164<sup>th</sup> Judicial District Court of Harris County, Texas; responsive

pleadings in Case No. 4:14-cv-02096; B Choice Limited, Plaintiff v. Epicentre

Development Associates, LLC, et al; Defendants; In the United States District

Court for the Southern District of Texas, Houston Division; and motions in Case

No. 14-31773; In Re: Elite Precision Fabricators, Inc.; United States Bankruptcy

Court for the Southern District of Texas, Houston Division.

For the foregoing reasons, all parties to this appeal respectfully request an

extension of 27 days for filing their opening briefs, to and including July 1, 2015.

Respectfully submitted,

REYNOLDS FRIZZELL LLP

By: /s/ Jean C. Frizzell

Jean C. Frizzell

State Bar No: 07484650

Jeremy Doyle

State Bar No: 24012553

Solace K. Southwick

State Bar No. 11522150

James A. Schuelke

2

State Bar No: 24075037

1100 Louisiana Street, Suite 3500

Houston, Texas 77002

Telephone: (713) 485-7200 Facsimile: (713) 485-7250 jfrizzell@reynoldsfrizzell.com jdoyle@reynoldsfrizzell.com ssouthwick@reynoldsfrizzell.com jschuelke@reynoldsfrizzell.com

## COUNSEL FOR PLAINTIFFS/ APPELLEES/CROSS-APPELLANTS

**VIADA & STRAYER** 

By: /s/ Ramón G. Viada III

Ramón G. Viada III State Bar No. 20559350 17 Swallow Tail Court The Woodlands, Texas 77381 Telephone: (281) 419-6338 Facsimile: (281) 419-8137 rayviada@viadastrayer.com

H. Fred Cook State Bar No. 04732500 WILSON, CRIBBS & GOREN, P.C. 2500 Fannin Street Houston, Texas 77002 Telephone: (713) 222-9000 Facsimile: (713) 229-8824

hfcook@wcglaw.net

### COUNSEL FOR DEFENDANT/ APPELLANT/CROSS-APPELLEE

# **CERTIFICATE OF SERVICE**

As required by Texas Rules of Appellate Procedure 6.3 and 9.5, I certify that I have served this document on all parties on June 4, 2015 via e-filing and/or e-mail.

H. Fred Cook Brandon Hedblom Wilson, Cribbs & Goren, P.C. 2500 Fannin Houston, Texas 77002

Ramon G. Viada III 17 Swallow Tail Court The Woodlands, Texas 77381

/s/ Jean C. Frizzell
Jean C. Frizzell